

U.S. Department of Justice

United States Attorney Southern District of New York

Jacob K. Javits Federal Building 26 Federal Plaza New York, New York 10278

May 19, 2025

BY ECF

The Honorable Jennifer L. Rochon United States District Court Southern District of New York United States Courthouse 500 Pearl Street New York, New York 10007

Re: United States v. Luis Martinez, a/k/a "Tutuma," et al.,

24 Cr. 376 (JLR)

Dear Judge Rochon:

The Government writes respectfully to request an adjournment of the conference scheduled for Wednesday, May 21, 2025, at 11:00 a.m., as to each of the defendants in the above-referenced case except defendant Wenlis Delarosa. The parties request an adjournment to July 2, 2025, at 11:00 a.m.—the date set in the Court's May 16, 2025 Order granting an adjournment as to defendant Luis Martinez (Dkt. 59)—to allow additional time for counsel to engage in discussions regarding potential pre-trial resolutions in this case. The Government respectfully requests that time be excluded through the date of the next conference for the same reasons. The Government submits that an exclusion of time is in the interest of justice for the reasons stated above. The

¹ Delarosa is scheduled to appear before the Court on May 21, 2025, at 11:00 a.m., so that the Court may address Delarosa's May 14, 2025 letter to the Court requesting the appointment of new counsel. (*See* Dkts. 56, 57). This letter does not seek an adjournment or exclusion of time as to Delarosa.

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Government has conferred with counsel for the defendants, who have confirmed that they consent to the exclusion of time here.

The conference scheduled for Wednesday, May 21, 2025 at 11:00 a.m. shall be adjourned to July 2, 2025 at 11:00 a.m. for all defendants except for Wenlis Delarosa. The conference on May 21, 2025 shall proceed with respect to Mr. Delarosa. As to defendants Gomez, Santos, and Ragan, speedy trial time shall be excluded until July 2, 2025. The Court finds that the ends of justice served by excluding such time outweigh the best interests of the public and the defendants in a speedy trial because of the parties' need to continue negotiations.

SO ORDERED.

By:

Lisa Daniels

Alexandra S. Messiter

Respectfully submitted,

United States Attorney

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Dated: May 20, 2025

New York, New York JENNIFER L. ROCHON

JENNIFICK L. ROCHON
United States District Judge

Cc: Counsel of record (by ECF)